

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(Eastern Division)

COMMONWEALTH CARE
ALLIANCE, HEALTH CARE FOR
ALL, GLENN CRENSHAW, AND
PAULA CRENSHAW, individually
and on behalf of persons similarly
situated,

Plaintiffs

v.

ASTRAZENECA
PHARMACEUTICALS L.P.,
ASTRAZENECA PLC,
ASTRAZENECA US, ZENECA, INC.,
AND ZENECA HOLDINGS, INC.,

Defendants.

No. 05 CV 10-335-DPW

**STIPULATION TO EXTEND TIME FOR DEFENDANTS
TO RESPOND TO PLAINTIFFS' CLASS ACTION COMPLAINT AND BRIEFING
SCHEDULE FOR PLAINTIFFS' MOTION TO REMAND CASE**

Plaintiffs Commonwealth Care Alliance, Health Care For All, Glen Crenshaw, and Paula Crenshaw, through their undersigned counsel, and Defendants AstraZeneca Pharmaceuticals LP, AstraZeneca PLC, AstraZeneca US, Zeneca, Inc. and Zeneca Holdings, Inc.,¹ through their undersigned counsel, hereby stipulate and agree as follows:

¹ Defendants hereby do not generally appear, but make only a limited appearance for purposes of seeking an extension of time. In so doing, the Defendants do not waive any objection to the Court's jurisdiction or other defenses. The parties stipulate and agree that, by filing this stipulation to extend time, the Defendants have not waived any objection to the Court's jurisdiction or other defenses.

Since the filing of Defendants' Motion to Extend Time on February 28, 2005, the Plaintiffs have informed the Defendants that the Plaintiffs intend to file a motion to remand the above-captioned action to state court.

It is hereby agreed that the briefing schedule for any such motion to remand shall be as follows:

- Plaintiffs shall have until and including March 22, 2005 to file the motion to remand;
- Defendants shall have until and including April 12, 2005 to file an opposition to Plaintiffs' motion to remand;
- Plaintiffs shall have until and including April 22, 2005 to file a reply to Defendants' opposition to the motion to remand;

It is hereby agreed that the time for the Defendants and each of them to file a motion, answer or otherwise respond to the putative Class Action Complaint and Jury Trial Demand pending in this action is extended to and including the thirtieth (30th) day following either (a) a decision from the Court on the Plaintiffs' motion to remand this case; or (b) written notice by the Plaintiffs that they will not file a motion to remand, or have withdrawn their motion to remand.

Further, the Defendants respectfully request that the Court schedule a hearing for oral argument on issues raised by the motion to remand and opposition thereto. The Plaintiffs leave to the Court's discretion the scheduling of a hearing for oral argument on the motion.

Respectfully submitted,

COMMONWEALTH CARE ALLIANCE,
HEALTH CARE FOR ALL, GLENN
CRENSHAW, PAULA CRENSHAW,
By their attorneys

ASTRAZENECA
PHARMACEUTICALS LP
ASTRAZENECA PLC
ZENECA, INC.
ZENECA HOLDINGS, INC.
By their attorneys,

“/s/” Thomas M. Sobol
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“/s/” Peter L. Welsh
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Dated: March 7, 2005

So ordered,

Honorable Douglas P. Woodlock, U.S.D.J.